

U.S. Department of Justice

United States Attorney Eastern District of New York

TH/MKP F. #2017R01840 271 Cadman Plaza East Brooklyn, New York 11201

September 24, 2018

By ECF

The Honorable Vera M. Scanlon United States Magistrate Judge **United States District Court** 225 Cadman Plaza East Brooklyn, New York 11201

> United States v. Keith Raniere, et al. Re:

> > Criminal Docket No. 18-204 (NGG) (S-1)

Dear Judge Scanlon:

On September 18, 2018, the Court ordered the government to provide a letter with its best estimates of the discovery production process, including a list of electronic and non-electronic discovery in its possession and a description of technical and labor constraints, by noon today, September 24, 2018. The government respectfully requests an extension to provide its letter until no later than 3:00 p.m. today, in order to include updated information regarding certain sources of discovery from the Federal Bureau of Investigation.

Respectfully submitted,

RICHARD P. DONOGHUE **United States Attorney**

By: /s/

> Moira Kim Penza Tanya Hajjar Assistant U.S. Attorneys

(718) 254-7000